# EXHIBIT P

## Safia Anand

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|---|---|
| **From:** | Ira S. Sacks |
| **Sent:** | Monday, April 14, 2008 5:02 PM |
| **To:** | 'john@bozlaw.com' |
| **Cc:** | 'ron.paltrowitz@bozlaw.com' |
| **Subject:** | RE: Sanei Charlotte Ronson and Nir deposition |
| **Importance:** | High |

John,

I am out of town but Aaron Nir just emailed and asked if his deposition is still on for Friday. What is the answer to that and the other question regarding the Nir deposition below?

My best,

Ira

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-----Original Message-----
**From:** Ira S. Sacks
**Sent:** Saturday, April 12, 2008 9:31 AM
**To:** 'john@bozlaw.com'
**Cc:** ron.paltrowitz@bozlaw.com
**Subject:** Sanei Charlotte Ronson and Nir deposition

John,

And just so you do not believe that continually repeating s misstatement makes it more true, on March 14, we agreed to give you a **sampling** of Sanei Charlotte Ronson invoices for all customers by March 25. That was followed up by emails and phone calls on March 20 in which we also agreed to your request to give you all Sanei Charlotte Ronson invoices for the *Eminent* defendants. We did all that by March 25.

For your own tactical and delaying reasons, you then said you wanted all sales orders. Despite the fact that I have asked you and Ron several times why you want sales orders in addition to invoices, we have gathered all Sanei Charlotte Ronson orders and all invoices as noted in my email below. Many of those are duplicates of what we have already produced. They will all be numbered and available for your inspection by late Monday. I will be traveling Monday and Tuesday. You can call Safia to arrange for inspection.

I need to know promptly the answer to certain the questions that I have asked you and Ron repeatedly since April 3 -- have you agreed that Mr. Nir's deposition will be taken in both cases. Also are you still going forward with his deposition on April 18, and if so what time?

My best,

4/15/2008

Ira

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